

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE URETHANE ANTITRUST
LITIGATION

Civil Action No. 08-5169 (WJM)(MF)

**PLAINTIFFS' PROPOSED
VOIR DIRE QUESTIONS**

This Document Relates to: All Actions

Background Information

1. Please state your full name.
2. What is your age?
3. In what town do you live?
 - A. How long have you lived there?
 - B. How many residences have you had in the last ten years?
 - C. Do you own or rent?
4. Where did you grow up?
5. Are you currently employed?
6. If you are currently employed, what company or organization do you work for?
7. Do you have responsibility to hire and fire at work?
8. Please list your last four jobs, employers, and dates of employment.
9. Please state the highest level of education you have obtained.
10. Please list any licenses, certificates, or degrees you have obtained.
 - A. If you have a college degree or higher, what were your areas of study?
11. Please describe any specialized training or skills you have.
12. What is your marital status?
13. Please list any social, professional, political or religious organizations to which you have belonged in the past 10 years.

A. Did you have any leadership roles in any of those organizations?

14. What do you like to do in your free time?

Experience with the legal system

15. Have you ever served on a jury or grand jury before?

A. If so, what was the case about?

B. Did the jury reach a decision?

C. Were you the foreperson?

D. Did your prior jury service leave you with a negative perception of serving on a jury that you think may prevent you from serving dutifully again?

16. Have you or anyone in your family ever sued, filed a lawsuit, joined a class action lawsuit, or made a claim against anyone?

A. If yes, what did the case involve?

B. Did it go to trial?

C. Were you satisfied with the result?

17. Have you or anyone in your family ever been prosecuted or had a claim filed against you?

A. If yes, what did the case involve?

B. Were you satisfied with the result?

18. Have you or anyone in your family ever been a witness in a lawsuit? If yes, please explain.

19. A plaintiff is a party who initiates a lawsuit. Do you have a bias for or against a plaintiff simply because this party brought a lawsuit?

20. A defendant is a party against whom a lawsuit is filed. Do you have a bias for or against a defendant simply because a lawsuit has been brought against it?

Experience related to this case

21. Have you ever worked, trained, or taken classes in any of the following fields?

A. Accounting or finance

B. Economics

- C. Business regulation
 - D. Chemicals
 - E. Law or the legal profession
 - F. Industry or trade associations
 - G. Manufacturing
 - H. Sales
 - I. Statistics
22. Are you familiar with the term “price fixing?”
23. Do you have any knowledge of antitrust laws or other laws governing business competition, such as the Sherman Antitrust Act?
24. Have you ever worked for a company or been involved in an organization that has been accused of violating antitrust laws?
25. Do you think it is rare for senior corporate executives to engage in illegal business activities?
26. Is it hard for you to believe an allegation that one company conspired with another company in order to set prices that they are going to charge?
27. Do you have a positive or negative opinion about large chemical corporations?

Miscellaneous questions

28. If you are selected as a juror, you will be prohibited from doing any independent investigation whatsoever regarding this case, the parties to this case, the subject matter involved in the case or the attorneys involved in the case. You may not do any Internet searches regarding any person, company, or topic in any way involved in this trial until after the trial has concluded. To do so compromises the fairness of the trial and violates your oath as a juror. Will you be able to abide by this order as a juror?
29. Do you have any hearing loss, sight impairment, or other physical or medical impairment(s) that would make jury duty difficult for you? If yes, please explain.
30. Do you take any medications that would make jury duty difficult for you? If yes, please explain.
31. Are you unable to sit in judgment of others due to religious, ethical, political, moral or other grounds?

32. It is possible that this case will take approximately five weeks to complete. Do you have a hardship that might make it impossible for you to commit this amount of time to this case? If yes, please explain.
33. Is there any other reason why you cannot or should not serve as a juror in this case? If yes, please explain.
34. If you were one of the parties in this litigation, is there any reason you wouldn't want yourself as a juror?

Familiarity with corporations and individuals involved in this case

35. Below is a list of corporate parties currently or formerly involved in this lawsuit. Please indicate if you or a family member know, have heard of, have worked for/with, have owned individual stock in, or have done business with any of these entities. Then, please explain how you know them, heard of them, or in what context you have worked for or done business with them, and whether you have a positive or negative opinion of them.

Carpenter Co.
Crest Foam Industries Inc.
Crest-Foam Corp.
E.R. Carpenter, L.P.
Flexible Foam Products, Inc.
Foam Supplies, Inc.
Hickory Springs Manufacturing Co.
Hickory Springs of California, Inc.
High Standard Pad, Inc.
Huber Engineered Woods LLC
J.M. Huber Corp.
L&P Financial Services Co.
Leaving Taos, Inc.
Leggett & Platt Components Co.
Leggett & Platt, Inc.
Lubrizol Advanced Materials, Inc.
Dash Multi-Corp., Inc.
MarChem Corp.
MarChem Southeast, Inc.
MarChem Pacific, Inc.
Nu-Foam Products, Inc.
Ohio Decorative Products, Inc.
Pathway Polymers Inc.
Skypark Manufacturing, LLC
Universal Urethanes, Inc.
Vitafoam Inc
Vitafoam Products Canada, Ltd.
Woodbridge Corp.

Woodbridge Foam Corp.
Woodbridge Foam Fabricating, Inc.
Woodbridge Holdings Inc.
Woodbridge Services Inc.
The Dow Chemical Company
BASF SE
BASF AG
BASF Corporation
BASF Coordination Center Comm. V.
Huntsman International LLC
Lyondell Chemical Company
Bayer AG
Bayer Corporation
Bayer MaterialScience AG
Bayer MaterialScience LLC

36. Below is a list of individuals who are attorneys or witnesses involved in this lawsuit. Please indicate if you or a family member know, have heard of, have worked for/with, or have done business with any of these individuals. Then, please explain how you know them, heard of them, or in what context you have worked for or done business with them, and whether you have a positive or negative opinion of them.

Jeffrey M. Johnson
Richard J. Leveridge
James R. Martin
Alex E. Hassid
Daniel P. Schaefer
James E. Cecchi
Lindsey H. Taylor
David M. Bernick
Lawrence S. Lustberg
Jonathan R. Streeter
Carolyn M. Hazard
William T. McEnroe
Jorge Burtin
Joseph Plati
David Underdown
William Long
Robert Wood
Jennifer D. Hackett
James Boehm
Jeffrey Briney
Martin Cosgrove
Helen Ebert
Del Felter
Nigel Hay
Larry Heppe

Franklin Hurst
Thomas Laursen
Bruce O'Brien
John Quackenbush
Stuart Watson
Alan Weber
Sandon Wool
Stephanie Barbour
William Bernstein
Michele Blumberg
Charles Churet
Jean-Pierre Dhanis
Edward Dineen
Arthur Eberhart
Thomas Feige
David Fischer
Gregory Geaman
Uwe Hartwig
Robert Kirk
Kenneth Lane
Robert Lawrence
Marco Levi
William Lizzi
Richard Mericle
Gerald Phelan
Lawrence Stern
Richard Beitel
Phillip Cook
Patrick Dawson
Patrick Ho
Frank Morgan
David Pashalidis
Lynn Schefsky
Paul Davidson
Stanley Pauley
Christopher Pugh
Kenneth Todd Councilman
Wilbur Mann
Don Simpson
Steven Jackson
Michael Vaughn
David Scott Wheeler
Gregory Comeaux
Peter Davies
Jerry Fosnaugh
William Kincaid

Tom McCormick
George Harrick
Wayne LeSage
Gerald MacCleary
John Phelps
Gerard Solini
Ernie Springolo
Anthony Hankins
James Coleman
Mark Talbert
Joe York
John Bruno
Michael Curti
Jeffrey Gomberg
Richard Loftin
Raj Mehta
David Fowler
Leslie M. Marx, Ph.D.
Kenneth G. Elzinga, Ph.D.
Keith R. Ugone, Ph.D.

Respectfully Submitted,

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